

scored orders missed for customer reasons as orders missed for Verizon reasons. *See* Attachment 20. During November 2001, Verizon completed 100 percent of CLEC DSL loop orders in Rhode Island within 9 days. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).

36. Verizon is also providing unbundled DSL loops to CLECs with a high level of quality. As we explained in our declaration, the New York PSC recently revised the installation quality measure in two ways. First, installation quality for DSL loops will be compared to retail dispatched POTS orders. Second, installation troubles within 30 days for *all* CLECs will be counted – not just those who test cooperatively with Verizon. Verizon's installation quality performance calculated according to the guidelines recently adopted by the New York PSC is in parity. During July, August and September 2001, the I-Code rate on DSL loops provided to all CLECs in Rhode Island was 6.09 percent, compared to 5.43 percent for the retail comparison group of dispatched POTS service. During October 2001, the I-Code rate on DSL loops provided to all CLECs in Rhode Island was 5.88 percent, compared to 5.96 percent for the retail comparison group of dispatched POTS service. During November 2001, the I-Code rate on DSL loops provided to all CLECs in Rhode Island was 2.99 percent, compared to 4.61 percent for the retail comparison group of dispatched POTS service. *See* Attachment 21.

37. Verizon's performance in Massachusetts continues to be excellent as calculated under the new business rules. During July, August and September 2001, the I-Code rate on DSL loops provided to all CLECs in Massachusetts was 6.28 percent, compared to 6.64 percent for the retail comparison group. During October 2001, the I-Code rate on DSL loops provided to all CLECs in Massachusetts was 6.80 percent,

compared to 6.46 percent for the retail comparison group. *See* Attachment 22. During November 2001, the I-Code rate on DSL loops provided to all CLECs in Massachusetts was 6.97 percent, compared to 6.21 percent for the retail comparison group, which are reported on the November Carrier-to-Carrier Performance Report. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).

38. Verizon's performance in maintaining and repairing CLEC DSL loops is also excellent. One measure of Verizon's maintenance performance is the network trouble report rate. During July, August and September 2001, 1.11 percent of CLEC DSL loops in Rhode Island had reported troubles found in either the outside plant or the central office, compared to 1.24 percent for the retail comparison group (retail POTS service) recently established by the New York PSC. During October 2001, 0.88 percent of CLEC DSL loops in Rhode Island had reported troubles found in either the outside plant or the central office, compared to 1.07 percent for the new retail comparison group. During November 2001, 0.74 percent of CLEC DSL loops in Rhode Island had reported troubles found in either the outside plant or the central office, compared to 0.83 percent for the new retail comparison group. *See* Attachment 23.

39. Verizon's network trouble report rate also continues to be strong in Massachusetts. During July, August and September 2001, fewer than one percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 1.43 percent for the retail comparison group (retail POTS service) recently established by the New York PSC. During October 2001, 0.85 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 1.12 percent for the new retail comparison

group. *See* Attachment 24. During November 2001, 0.64 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.88 percent for the new retail comparison group, which are reported on the November Carrier-to-Carrier Performance Report. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).

40. Another measure of Verizon's performance is the percentage of repair appointments for DSL loops that Verizon fails to meet. As we demonstrated in our declaration, Verizon met all but one repair appointment in July, all but two in August and all but one in September. During October and November 2001, Verizon met all repair appointments in Rhode Island. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).

41. Verizon's performance under this measure in Massachusetts continues to be excellent. During July, August and September 2001, Verizon met 91.35 percent of repair appointments for CLECs in Massachusetts, compared to 80.86 percent for the retail comparison group. During October 2001, Verizon met 94.51 percent of repair appointments for DSL loops in Massachusetts, compared to 79.03 percent for the retail comparison group. During November 2001, Verizon met 92.37 percent of repair appointments for DSL loops in Massachusetts, compared to 91.10 percent for the retail comparison group. *See* Attachment 25.

42. A third measure of Verizon's maintenance performance is the comparative time to complete repairs. During July, August and September 2001, Verizon's mean time to repair a trouble outside the central office in Rhode Island was 16.25 hours for CLECs, compared to 23.04 hours for the retail comparison group. During this same period,

Verizon's mean time to repair a trouble in the central office in Rhode Island was 5.69 hours for CLECs, compared to 15.70 hours for the retail comparison group. During October 2001, Verizon's mean time to repair a trouble outside the central office in Rhode Island was 14.47 hours for CLECs, compared to 37.33 hours for the retail comparison group. Also during October 2001, Verizon's mean time to repair a trouble in the central office in Rhode Island was 2.00 hours for CLECs, compared to 16.41 hours for the retail comparison group. During November 2001, Verizon's mean time to repair a trouble outside the central office in Rhode Island was 10.79 hours for CLECs, compared to 13.15 hours for the retail comparison group. Also during November 2001, Verizon's mean time to repair a trouble in the central office in Rhode Island was 0.65 hours for CLECs, compared to 12.97 hours for the retail comparison group. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

43. Verizon's Massachusetts performance under this measure also continues to be excellent. During July, August and September 2001, Verizon's mean time to repair a trouble outside the central office was 18.95 hours for CLECs, compared to 27.98 hours for the retail comparison group. During this same period, Verizon's mean time to repair a trouble in the central office was 6.94 hours for CLECs, compared to 13.49 hours for the retail comparison group. During October 2001, Verizon's mean time to repair a trouble outside the central office in Massachusetts was 19.48 hours for CLECs, compared to 30.39 hours for the retail comparison group. Also during October 2001, Verizon's mean time to repair a trouble in the central office in Massachusetts was 10.03 hours for CLECs, compared to 11.89 hours for the retail comparison group. During November 2001, Verizon's mean time to repair a trouble outside the central office in Massachusetts was

16.17 hours for CLECs, compared to 17.90 hours for the retail comparison group. Also during November 2001, Verizon's mean time to repair a trouble in the central office in Massachusetts was 2.54 hours for CLECs, compared to 10.58 hours for the retail comparison group. *See* Attachment 26.

44. Finally, Verizon's repeat trouble report rates in Rhode Island and Massachusetts are in parity during the period July through November 2001 when calculated under the guidelines recently adopted by the New York PSC (which exclude trouble reports where the CLEC misidentified the location of the trouble and where Verizon did not have access to the customer premises). *See* Attachment 27. Verizon's repeat trouble report rate in Massachusetts is reported under the new guidelines in the November Carrier-to-Carrier Performance Report. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).

e. Line Sharing.

45. As we demonstrated in our initial declaration, Verizon's overall line sharing performance has been excellent. Verizon's line sharing performance continues to be strong in October and November 2001. Through November 2001, Verizon has completed approximately 6 line sharing arrangements in Rhode Island for unaffiliated CLECs, and over **** line sharing arrangements for its separate data affiliate. In Massachusetts, through November 2001, Verizon has completed over 4,000 line sharing orders for unaffiliated CLECs.

46. Verizon is continuing to provision CLEC line sharing orders when CLECs want them. Because of the low CLEC line sharing volumes in Rhode Island, Massachusetts data is more probative of Verizon's line sharing performance. In addition,

because most line sharing orders do not require a dispatch outside of the central office, the provisioning measures for the no-dispatch line sharing orders are the most significant. During July, August and September 2001, Verizon missed less than one percent of no-dispatch orders for both CLECs in Massachusetts. During October and November 2001, Verizon did not miss any no-dispatch orders for CLECs in Massachusetts. *See* Attachment 28.

47. Another provisioning measure that Verizon has reported in the past is Average Interval Completed, which records the average number of days it takes Verizon to provision a line sharing order from Verizon's receipt of a valid order to actual work completion. As we explained in our declaration, because the New York PSC has decided to eliminate the average interval completed measures from the Carrier-to-Carrier Performance Reports, there is no reason for the FCC to consider or rely upon these measures. Nonetheless, during the July, August and September 2001, Verizon's average interval completed in Massachusetts was 3 days for CLECs and VADI. During October 2001, Verizon's average interval completed in Massachusetts was 2.83 days for CLECs and 2.95 days for VADI. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2). This measure does not appear in Verizon's November 2001 report.

48. Verizon reports another provisioning measure – percentage of loops completed within 3 business days (PR-3-03). Although the Commission has not relied on similar measures in the past and need not do so here, Verizon's performance for this measure is nevertheless good. In our initial declaration, we showed that Verizon's ability to provision line sharing orders within three business days when a three business-day

interval was requested was over 98 percent for CLECs and VADI in Massachusetts during July, August and September 2001. Verizon's performance under this measure for CLECs during October 2001 was over 95 percent in Massachusetts and during November 2001 was 100 percent. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

49. Verizon is also continuing to provide line sharing arrangements to CLECs with a high degree of quality. As we explained in our declaration, during July, August and September 2001, less than 2 percent of the line sharing arrangements in Massachusetts had troubles reported within 30 days of installation (*i.e.*, the I-Code rate). During October 2001, the line sharing I-Code rate in Massachusetts was 1.87 percent. During November 2001, the line sharing I-Code rate in Massachusetts was 1.24 percent. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

50. As we explained in our initial declaration, during July, August and September 2001, there were no CLEC line sharing trouble tickets submitted in Rhode Island. During October and November 2001, there were likewise no CLEC line sharing trouble tickets submitted in Rhode Island. There continues to be very little CLEC maintenance and repair activity for line sharing in Massachusetts. During July, August and September 2001, CLECs submitted fewer than 30 measured line sharing trouble tickets in Massachusetts. During October and November 2001, CLECs submitted fewer than 15 measured line sharing trouble tickets in Massachusetts. With such low volumes of CLEC trouble tickets, the performance data can fluctuate significantly based on the results for a handful of trouble tickets. Nevertheless, the limited performance data that is

available demonstrates that Verizon is providing CLECs with excellent maintenance and repair service for line sharing.

51. The first measure on which the FCC has relied in the past tracks the percentage of repair appointments that Verizon misses. Most line sharing troubles are found in the central office and therefore do not require an outside dispatch. Consequently, the Percent Missed Repair Appointment – Central Office measure (MR-3-02) is the most significant indicator of Verizon's line sharing performance. In Massachusetts, where CLECs have submitted only 26 central office troubles during July, August and September 2001, there are not enough observations to make this a meaningful measure. Nevertheless, Verizon met all but 4 CLEC repair appointments during that time period. During October and November 2001, Verizon met all CLEC repair appointments in Massachusetts. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

52. The second maintenance and repair measure is the Repeat Trouble Report measure, which tracks the number of repeat trouble reports within 30 days of an initial repair (MR 5-01). During July, August and September 2001, Verizon received repeat trouble reports for only 8 CLEC line sharing arrangements in Massachusetts. During October and November 2001, Verizon received repeat trouble reports for only two CLEC line sharing arrangements in Massachusetts. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

53. Mean time to repair is the third maintenance and repair measure. As with the other maintenance measures, the mean time to repair measure for central office troubles is the more relevant measure. During July, August and September 2001,

Verizon's mean time to repair line sharing central office troubles in Massachusetts was in parity with 9.07 hours for CLECs and 13.49 hours for VADI. During October 2001, Verizon's mean time to repair line sharing central office troubles in Massachusetts was 6.49 hours for CLECs and 11.89 hours for VADI. During November 2001, Verizon's mean time to repair line sharing central office troubles in Massachusetts was 10.84 hours for CLECs and 12.21 hours for VADI. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

54. Although the FCC has found it unnecessary to rely on the total trouble report rate in the past, the performance for this measure is excellent. The total trouble report rate measures the overall reliability of line shared loops. As with DSL loops, the sum of troubles found in the outside plant portion of the loop (MR-2-02) and troubles found in the central office (MR-2-03) provides a total picture of troubles with line shared loops. In Massachusetts, during July through November 2001, the weighted average of the total trouble report rate was less than one percent for both CLECs and VADI, or to put it another way, on average, no troubles were found on over 99 percent of line shared loops in service during these months. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

III. Verizon Provides Other Checklist Items.

55. We demonstrated that Verizon provides all other checklist items in Rhode Island and that Verizon's performance in both Rhode Island and Massachusetts is excellent. With one exception, no commenter challenged Verizon's other checklist items. In this section of our reply declaration, we address the issues raised by CTC regarding

dark fiber. We also provide updated data showing that Verizon's performance continues to be strong.

a. Interconnection.

56. We demonstrated in our declaration that Verizon's interconnection service offerings, processes and procedures in Rhode Island are the same as those in Massachusetts, which the Massachusetts PSC and the FCC found met the requirements of the Telecommunications Act of 1996. We also demonstrated that Verizon's performance in providing interconnection trunking is strong. During July, August and September 2001, Verizon completed 100 percent of CLEC trunk orders for CLECs in Rhode Island on time and had no installation troubles reported within 30 days on interconnection trunks. During October and November 2001, Verizon likewise completed 100 percent of CLEC trunk orders in Rhode Island on time and had no installation troubles on interconnection trunks. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

57. Verizon's trunking performance in Massachusetts continues to be strong. During July, August and September 2001, Verizon completed 97.2 percent of CLEC trunk orders on time and had no installation troubles reported within 30 days on interconnection trunks. During October 2001, Verizon completed 99.53 percent of CLEC trunk orders on time in Massachusetts and had only one installation trouble reported within 30 days on interconnection trunks. During November 2001, Verizon completed 100 percent of CLEC trunk orders on time in Massachusetts and had no installation troubles reported within 30 days on interconnection trunks. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

b. Collocation.

58. Verizon's collocation performance has continued to be strong in Rhode Island. As we explained in our declaration, during July, August and September 2001, Verizon completed on time every new collocation arrangement and collocation augment in Rhode Island. During October and November 2001, Verizon completed no new collocation arrangements and 4 collocation augments in Rhode Island. All of those augments were completed on time. *See Carrier-to-Carrier Performance Reports* (Guerard/Canny/Abesamis Reply Decl., Att. 1).

59. Verizon's collocation performance in Massachusetts has also continued to be strong. During July, August and September 2001, Verizon completed 45 new physical collocation arrangements and 67 augments to physical collocation arrangements in Massachusetts. All of these collocation arrangements were completed on time. During October and November 2001, Verizon completed 3 new collocation arrangements and 29 collocation augments in Massachusetts. All of those new collocation arrangements and augments were completed on time. *See Carrier-to-Carrier Performance Reports* (Guerard/Canny/Abesamis Reply Decl., Att. 2).

c. Unbundled Local and Tandem Switching.

60. Verizon is providing unbundled local switching elements to CLECs when they request them. As we explained in our declaration, during July, August and September 2001, Verizon missed less than one half of one percent of local switching/platform installation appointments in both Rhode Island and Massachusetts. During October and November 2001, Verizon missed less than one percent of local switching/platform installation appointments in both Rhode Island and Massachusetts.

See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Atts. 1 and 2).

61. Verizon is installing local switching/platform elements with excellent quality in Rhode Island. During July, August and September 2001, only 1.03 percent of CLEC local switching/platforms experienced troubles within 30 days of installation, as compared to 4.12 percent for the retail comparison group. During October 2001, only 0.58 percent of CLEC local switching/platforms in Rhode Island experienced troubles within 30 days of installation, as compared to 4.49 percent for the retail comparison group. During November 2001, only 0.89 percent of CLEC local switching/platforms in Rhode Island experienced troubles within 30 days of installation, as compared to 3.56 percent for the retail comparison group. *See* Attachment 29.

62. Verizon's performance under this measure also continues to be strong in Massachusetts. During July, August and September 2001, only 0.90 percent of CLEC local switching/platforms in Massachusetts experienced troubles within 30 days of installation, as compared to 3.63 percent for the retail comparison group. During October 2001, only 1.32 percent of CLEC local switching/platforms in Massachusetts experienced troubles within 30 days of installation, as compared to 3.31 percent for the retail comparison group. During November 2001, only 1.06 percent of CLEC local switching/platforms in Massachusetts experienced troubles within 30 days of installation, as compared to 3.12 percent for the retail comparison group. *See* Attachment 30.

63. We also demonstrated that Verizon is making its repair services for unbundled local switching/platforms available to CLECs on a nondiscriminatory basis. One measure of Verizon's maintenance performance is the network trouble report rate.

During July, August and September 2001, only 1.35 percent of local switching/platforms in Rhode Island had reported troubles found in the central office or outside plant. During October 2001, only 1.05 percent of local switching/platforms in Rhode Island had reported troubles found in the central office or outside plant. During November 2001, only 1.06 percent of local switching/platforms in Rhode Island had reported troubles found in the central office or outside plant. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

64. Verizon's performance under this measure also continues to be strong in Massachusetts. During July, August and September 2001, only 1.17 percent of local switching/platforms in Massachusetts had reported troubles found in the central office or outside plant. During October 2001, only 1.01 percent of local switching/platforms in Massachusetts had reported troubles found in the central office or outside plant. During November 2001, only 0.80 percent of switching/platforms in Massachusetts had reported troubles found in the central office or outside plant. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

65. Another measure of Verizon's maintenance performance is the missed appointment rate. During July, August and September 2001, Verizon's average missed repair appointment rate in Rhode Island for troubles was 5.00 percent for unbundled local switching/platforms and 7.15 percent for the retail comparison group. During October and November 2001, Verizon missed one repair appointment in Rhode Island for unbundled local switching/platforms troubles. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

66. Verizon's performance under this measure also continues to be strong in Massachusetts. During July, August and September 2001, Verizon's average missed repair appointment rate in Massachusetts for troubles cleared in the central office was 10.11 percent for unbundled local switching/platforms and 10.71 percent for the retail comparison group. During October 2001, Verizon's average missed repair appointment rate in Massachusetts for troubles cleared in the central office was 12.6 percent for unbundled local switching/platforms and 10.32 percent for the retail comparison group. During November 2001, Verizon's average missed repair appointment rate in Massachusetts for troubles cleared in the central office was 11.09 percent for unbundled local switching/platforms and 10.49 percent for the retail comparison group.

67. A third measure of Verizon's maintenance performance is the comparative intervals to complete repairs. During July, August and September 2001, Verizon's overall mean time to repair in Rhode Island for unbundled local switching/platforms provided to CLECs was 16.69 hours, compared to 23.13 hours for the retail comparison group. During October 2001, Verizon's overall mean time to repair in Rhode Island for unbundled local switching/platforms provided to CLECs was 6.10 hours, compared to 14.80 hours for the retail comparison group. During November 2001, Verizon's overall mean time to repair in Rhode Island for unbundled local switching/platforms provided to CLECs was 6.27 hours, compared to 16.28 hours for the retail comparison group. *See Attachment 31.*

68. Verizon's performance in Massachusetts under this measure also continues to be strong. During July, August and September 2001, Verizon's overall mean time to repair in Massachusetts for unbundled local switching/platforms provided

to CLECs was 15.82 hours, compared to 22.97 hours for the retail comparison group. During October 2001, Verizon's overall mean time to repair in Massachusetts for unbundled local switching/platforms provided to CLECs was 14.77 hours, compared to 18.83 hours for the retail comparison group. During November 2001, Verizon's overall mean time to repair in Massachusetts for unbundled local switching/platforms provided to CLECs was 13.13 hours, compared to 17.12 hours for the retail comparison group. *See Attachment 32.*

69. Finally, Verizon's repeat trouble report rate is in parity in Rhode Island during July through November 2001. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).* Verizon's repeat trouble report rate is also in parity in Massachusetts during July through November 2001. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1) and Attachment 33.*

d. Unbundled Local Transport.

70. We demonstrated that Verizon offers CLECs the same access to local transport unbundled from switching, including both dedicated and shared transport, using the same processes and procedures in both Rhode Island and Massachusetts. Verizon provisions too few unbundled transport orders (less than 10 each month) to provide meaningful performance results in Rhode Island. Nonetheless, during July, August and September 2001, Verizon missed no installation appointments in July and only a small number of installation appointments – 1 and 2 – were missed in August and September, respectively. Verizon missed no appointments in October and only one installation

appointment in November. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).

71. Verizon's unbundled dedicated transport performance in Massachusetts continues to be strong. During July, August and September 2001, Verizon's missed installation appointment rate was 1.96 percent. Verizon missed no appointments in October and only two installation appointments in November. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).

e. Dark Fiber.

72. Verizon provides non-discriminatory access to unbundled dark fiber in accordance with the FCC's requirements. As we indicated in our initial declaration, through September 2001, Verizon provisioned 35 dark fiber orders in Rhode Island, and it completed 97 percent of those orders on time. There were no unbundled dark fiber orders in Rhode Island scheduled for completion in October and November 2001. In fact, as of January 3, 2002, there were no pending dark fiber orders in Rhode Island.

73. During July, August and September 2001, the months addressed in our initial declaration, Verizon's dark fiber offering in Rhode Island was substantially the same as Verizon's dark fiber offering in New York, Pennsylvania and Connecticut. In Massachusetts, the Massachusetts Department of Telecommunications and Energy ("Massachusetts DTE") required Verizon to comply with certain dark fiber requirements that go beyond and indeed, in some instances, are inconsistent with those required by the FCC's *UNE Remand Order*. The Massachusetts DTE's dark fiber decision was the result of an arbitration order that was initially rendered prior to the FCC's *UNE Remand Order*. Among other things, the Massachusetts DTE required Verizon to provide access to

unbundled dark fiber at existing splice points. During the course of the underlying Rhode Island state proceeding, CTC argued that the Rhode Island Public Utilities Commission (“Rhode Island PUC”) should require Verizon to comply with the same dark fiber requirements adopted by the Massachusetts DTE.

74. CTC is the sole CLEC that challenges Verizon’s dark fiber offering even though CTC itself admits that the Rhode Island PUC’s dark fiber decision in its December 3, 2001 UNE Order is “reasonable.” CTC at 8. The Rhode Island PUC’s December 3, 2001 UNE Order directed Verizon to “splice dark fiber at any technically feasible point on a time and materials basis, so as to provision continuous dark fiber through one or more intermediate central offices without requiring the CLEC to be collocated at any of such offices.” *See Verizon Rhode Island’s TELRIC Studies UNE Remand*, Report and Order, Dkt. No. 2681, State of Rhode Island and Providence Plantations Public Utilities Commission, December 3, 2001 at 22 (“*Rhode Island UNE Order*”). Additionally, the Rhode Island PUC found that Verizon must assume responsibility for identifying alternative dark fiber routes between central offices when the route requested by the CLEC is unavailable. *Id.*

75. Verizon has already complied with the Rhode Island PUC’s new dark fiber requirements. On December 14, 2001, Verizon made a compliance tariff filing with the Rhode Island PUC implementing the requirements of the *Rhode Island UNE Order*, including the Rhode Island PUC’s newly-adopted modifications to Verizon’s dark fiber offering. *See* December 20, 2001 *Ex Parte* Letter from Clint Odom to Magalie Roman Salas. Under the *Rhode Island UNE Order*, the revised dark fiber tariff will become effective February 1, 2002. *See Rhode Island UNE Order* at 23.

f. Resale.

76. We demonstrated that Verizon makes its telecommunications services available for resale in the same manner and using the same processes and procedures in both Rhode Island and Massachusetts. We also demonstrated that Verizon's resale performance is excellent. During October and November 2001, Verizon's resale performance continued to be excellent.

77. Verizon is providing resale services when CLECs want them. During July, August and September 2001, Verizon's missed appointment rate on resale orders in Rhode Island that did not require a dispatch was less than one tenth of one percent. During October and November 2001, Verizon did not miss any installation appointments on resale orders in Rhode Island that did not require a dispatch. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

78. In addition, during July, August and September 2001, Verizon's missed appointment rate on resale orders in Rhode Island that did require a dispatch was 3.90 percent, as compared to 3.0 percent for the retail comparison group. During October and November 2001, Verizon did not miss any installation appointments on resale orders in Rhode Island that required a dispatch. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

79. Verizon's on-time performance in Massachusetts also continues to be strong. During July, August and September 2001, Verizon's missed appointment rate on resale orders in Massachusetts that did not require a dispatch was less than one tenth of one percent. During October and November 2001, Verizon's missed appointment rate on resale orders in Rhode Island that did not require a dispatch was again less than one tenth

of one percent. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

80. In addition, during July, August and September 2001, Verizon's missed appointment rate in Massachusetts on resale orders that did require a dispatch was 4.32 percent, as compared to 5.89 percent for the retail comparison group. During October 2001, Verizon's missed appointment rate in Massachusetts on resale orders that did require a dispatch was 5.63 percent, as compared to 5.80 percent for the retail comparison group. During November 2001, Verizon's missed appointment rate in Massachusetts on resale orders that did require a dispatch was 3.58 percent, as compared to 5.17 percent for the retail comparison group. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

81. Verizon is also installing resale services for CLECs with a high level of quality. During July, August and September 2001, only 2.22 percent of CLEC resale lines in Rhode Island had reported troubles within 30 days of installation, as compared to 4.12 percent for the retail comparison group. During October 2001, only 1.57 percent of CLEC resale lines in Rhode Island had reported troubles within 30 days of installation, as compared to 4.49 percent for the retail comparison group. During November 2001, only 2.43 percent of CLEC resale lines in Rhode Island had reported troubles within 30 days of installation, as compared to 3.56 percent for the retail comparison group. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

82. Verizon's installation quality on resale service in Massachusetts also continues to be strong. During July, August and September 2001, only 2.56 percent of CLEC resale lines in Massachusetts had reported troubles within 30 days of installation,

as compared to 3.63 percent for the retail comparison group. During October 2001, only 2.22 percent of CLEC resale lines in Massachusetts had reported troubles within 30 days of installation, as compared to 3.31 percent for the retail comparison group. During November 2001, only 2.45 percent of CLEC resale lines in Massachusetts had reported troubles within 30 days of installation, as compared to 3.12 percent for the retail comparison group. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).*

83. Verizon's maintenance of Verizon's resale service in Rhode Island is consistently comparable to its maintenance of its own retail services. During July, August and September 2001, Verizon's maintenance performance results for resale orders, such as the trouble report rate, missed repair appointments and repeat trouble reports, were comparable to or better than the performance results for Verizon's retail orders in Rhode Island. During October and November 2001, Verizon's maintenance performance results for resale orders in Rhode Island were likewise comparable to or better than Verizon's retail performance. *See Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 1).*

84. Verizon's maintenance of Verizon's resale service in Massachusetts is consistently comparable to its maintenance of its own retail services. During July, August and September 2001, Verizon's maintenance performance results for resale orders, such as the trouble report rate, missed repair appointments and repeat trouble reports, were comparable to or better than the performance results for Verizon's retail orders in Massachusetts. During October and November 2001, Verizon's maintenance performance results for resale orders in Massachusetts was likewise comparable to or

better than Verizon's retail performance. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/Abesamis Reply Decl., Att. 2).

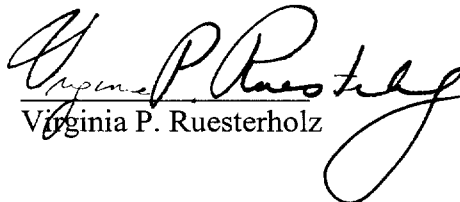
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 7, 2002


Paul A. Lacouture

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

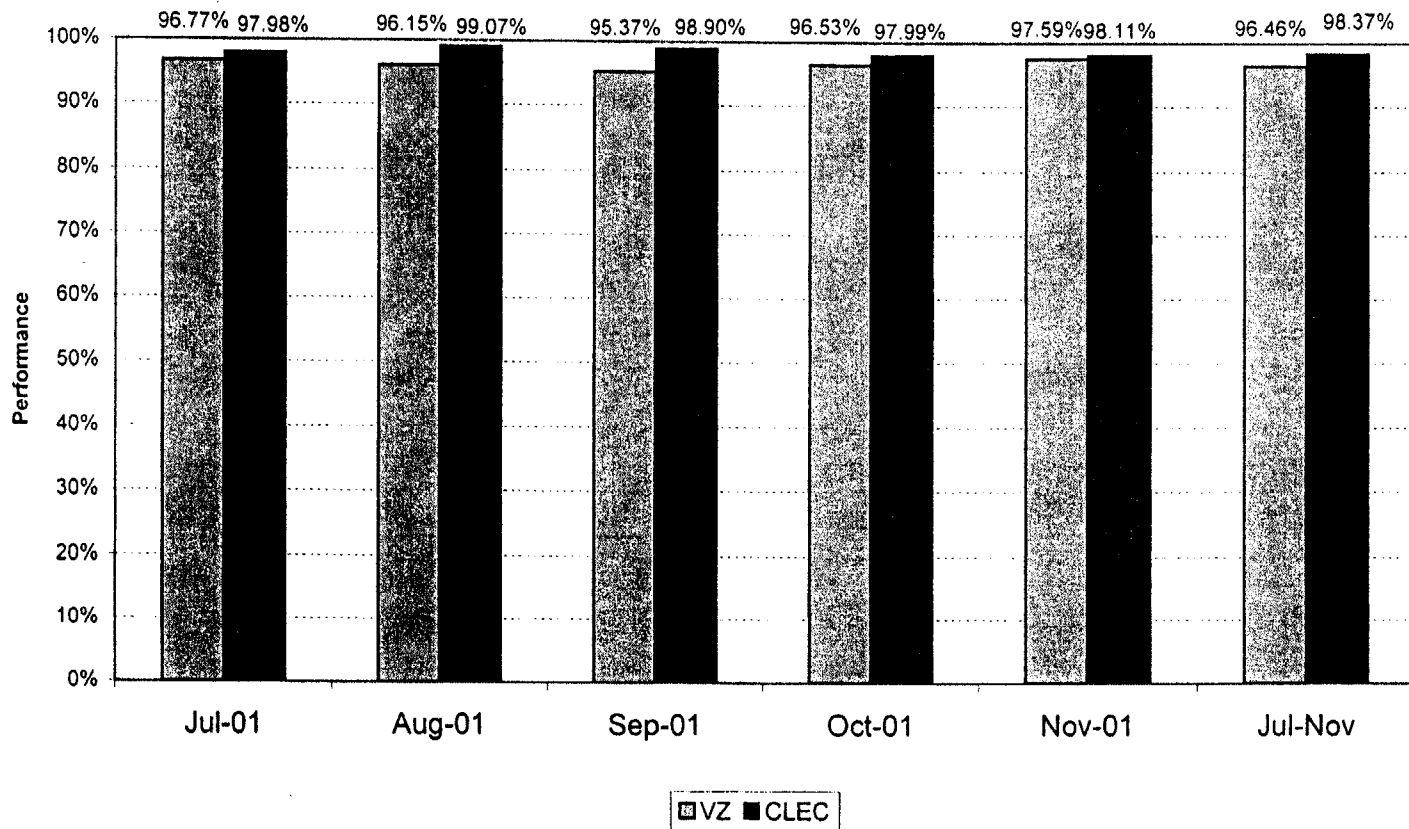
Executed on January 7, 2002


Virginia P. Ruesterholz

REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ

ATTACHMENT 1

Rhode Island - UNE POTS
Provisioning - % Appointments Met - Verizon - Dispatch - Loop New - (Inverse of PR-4-04)
Jul - Nov 01



Rhode Island - UNE POTS
Provisioning - % Missed Appointments - Verizon - Dispatch - Loop New - (PR-4-04)
Jul - Nov 01

PR-4-04Jul-01Aug-01Sep-01Oct-01Nov-01Jul-Nov

VZ
Performance
Observations

3.23%	3.85%	4.63%	3.47%	2.41%	3.54%
3967	4077	3869	3948	3532	19393

CLEC
Performance
Observations

2.02%	0.93%	1.10%	2.01%	1.89%	1.63%
99	108	91	149	106	553

% Appointments Met Inverse of PR-4-04

VZ
Performance
CLEC
Performance

96.77%	96.15%	95.37%	96.53%	97.59%	96.46%
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97.98%	99.07%	98.90%	97.99%	98.11%	98.37%
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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 2